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MEMBER

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August 6, 2024

VIA ECF

Hon. Valerie Figueredo
United States Courthouse
500 Pearl Street
New York, New York 10007
FigueredoNYSDchambers@nysd.uscourts.gov

MEMO ENDORSED



HON. VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE

DATED: August 8, 2024

The briefing schedule requested herein is granted. The deadline for A-I-I to file its Opposition is September 13, 2024 and the deadline for Plaintiff's Reply is October 9, 2024.

Re: *Brian Joseph Gref v. American International Industries, et al.*
Case No.: 1:20-cv-05589-GBD-VF

Dear Judge Figueredo:

This office represents defendant American International Industries ("A-I-I") in the above-entitled action. We respectfully submit this correspondence with regard to Plaintiff's Motion to Dismiss (ECF No. 448), filed on July 31, 2024. As you will recall, this is the matter which was conferenced in-person on July 18, 2024. There are several additional issues that need to be addressed in response to Plaintiff's Motion.

We have conferred with Plaintiff's counsel, Olivia Kelly of Simmons Hanly Conroy, regarding a briefing schedule relative to this Motion. We proposed the following briefing schedule:

- **September 13, 2024:** A-I-I Opposition to be filed
- **October 9, 2024:** Plaintiff's Reply in further support of his MTD to be filed

Plaintiff has not agreed with these dates. We ask the Court to approve the above schedule despite Plaintiff's lack of consent. Thank you in advance for considering this request.

Respectfully,



Christopher S. Kozak

cc: Olivia Kelly, Esq.